Colorado River Basin Regional Water Quality Control Board

RESPONSES TO COMMENTS

Tentative Orders
Waste Discharge Requirements Order R7-2022-0014
and Monitoring and Reporting Program

Scheduled Adoption Date
June 14, 2022

Agenda Item
5

Public Notice
7-22-16

Comment Period
April 19, 2022, to May 19, 2022

Discharger(s)
Hi-Desert Water District

Facility/Project
Yucca Valley Wastewater Reclamation Plant

County
San Bernardino County

Staff Contact
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Table 1. Comments Received.

Commentor, Affiliation	Submittal Date	Notes
Doug Culbert, Chief Plant Operator Hi-Desert Water District	April 21, 2022	N/A

Comments from Hi-Desert Water District (HDWD)

HDWD-1

Subject(s): WDRs Order, Finding 3 (p. 1)

Requested Revision(s): Remove “Phase 3” as Phases 2 and 3 were combined in the Basin Plan amendment.

Comment(s): The Finding states that the WRP is being constructed in three phases. The Basin Plan amendment in June 2021 combined phases 2 and 3 into one phase, phase 2.

Staff Response: Requested changes accepted.

Changes: “Phase 3” removed.

HDWD-2

Subject(s): WDRs Order, Finding 10, p. 3 (Wastewater Reclamation Facility and Discharge)

Requested Revision(s): Remove “or belt filter press.”

Comment(s): None.

Staff Response: Requested changes accepted.

Changes: Removal of “…or belt filter press.”

HDWD-3

Subject(s): WDRs Order, Finding 14, p. 4 (Hydrogeologic Conditions)

Requested Revision(s): None.

Comment(s): When was the on-site infiltration test performed?

Staff Response: This information is from Section 4 (Hydrological Conditions, p. B-5) of HDWD's January 7, 2020 submittal, titled *TDS Study Work Plan and Timeline Revised Final*, which states as follows:

> A pilot-scale infiltration pond was constructed at YVUZ-5 to evaluate recharge processes in the vicinity of the proposed GRPP. A total of approximately 31.2 acre-feet of water was applied to the infiltration pond at YVUZ-5 in 2008 and 2009. Surficial vertical infiltration rates were as high as 6.1 feet per day (ft/d) and declined to as low as 0.2 ft/d due to fine-grained material and algae clogged the pond bottom. Infiltrated water reached the water table after approximately 133 days and moved at an average vertical rate of about 2.8 ft/d (O'Leary and others, 2015).

The information referencing the on-site infiltration test is also presented in section 2.8.5.3 (Infiltration Rate, p. 21) of HDWD's Final Title 22 Engineering Report dated November 20, 2020 (Engineering Report).

Changes: None.

HDWD-4

Subject(s): WDRs Order, Finding 18, p.5 (Hydrogeologic Conditions)

Requested Revision(s): None.

Comment(s): Regarding monitoring of the Institute of Mental Physics wells annually for sucralose as an indicator compound, is there a specific well to be sampled or all of the wells sampled?

Staff Response: All of the wells are required to be sampled per Division of Drinking Water's (DDW) August 18, 2021, Engineering Report Conditional Acceptance Letter

(Acceptance Letter). The following wells are to be monitored until they are no longer in service: Well 01 (Vault)-PS Code 3600768-001 and New Well-PS Code 3600768-005.

Changes: None

HDWD-5

Subject(s): WDRs Order, Finding 36.c, p.10 (Antidegradation Analysis)

Requested Revision(s): Replace “ith” with “with.”

Comment(s): Remove typo.

Staff Response: Requested changes accepted.

Changes: Replaced “ith” with “with.”

HDWD-6

Subject(s): WDRs Order, Finding 36.c, p. 10 (Antidegradation Analysis)

Requested Revision(s): None.

Comment(s): With coliform levels so low already, how do you suggest that we evaluate the source at such a substantial depth? Coliform could come from a number of sources.

Staff Response: The WDRs require a *Groundwater Monitoring Network Technical Report and Work Plan* that includes an investigation to determine the source of bacteria previously detected in the groundwater monitoring wells. It would be inappropriate for staff to prescribe the particular means of compliance with this directive. (See Wat. Code, § 13360.) However, staff generally concur that coliform could come from a number of sources, including sample contamination.

Changes: None.

HDWD-7

Subject(s): WDRs Order, § C.8, p.15 (Discharge Prohibitions)

Requested Revision(s): None.

Comment(s): Does this prohibition include providing irrigation for the Town of Yucca Valley parks once we become a GRRP?

Staff Response: The WDRs do not contain the provision to allow for use of recycled water for irrigation. The Engineering Report would need to be revised to include the use of treated wastewater for the proposed use. Updated WDRs would then be issued to include irrigation for the Town of Yucca Valley parks as a use for the treated wastewater.

Changes: None.

HDWD-8

Subject(s): WDRs Order, § D.7, p. 16 (Discharge Specifications)

Requested Revision(s): None.

Comment(s): What mitigation factors do we employ if we get an acute odor complaint from beyond the limits of the treatment plant?

Staff Response: Acute or objectionable odors originating at the WRP an indication that one or more of the treatment units are not operating properly. If an odor complaint is received, HDWD is required to investigate the source of the odors and make corrections to the treatment units that are malfunctioning.

Changes: None.

HDWD-9

Subject(s): WDRs Order, § E.2, p. 19 (UV Disinfection Process Requirements)

Requested Revision(s): None.

Comment(s): Please define what "inadequately treated" means. Why would disinfected wastewater need to be diverted? Do we need to divert to off-spec if the UVT falls below 52% as long as the UV dose meets the minimum standards of this order?

Staff Response: Inadequately treated wastewater would be any wastewater that does not meet the requirements specified and/or permitted standards. Any inadequately treated and disinfected wastewater shall be diverted to a storage basin or an upstream process for adequate treatment. By diverting the wastewater, the wastewater would then undergo the treatment process until it reaches the permitted standards necessary for discharge. Diverting to the off-spec basin would be required if either of the following occurs: the UV transmittance falls below 52 percent or UV dose falls below 100 millijoules per square centimeter (mJ/cm^2).

Changes: None.

HDWD-10

Subject(s): WDRs Order, § H.1, p. 20 (Special Provisions)

Requested Revision(s): None.

Comment(s): Is this a new required study? Was this information not covered in the T22 report or are you just looking for current data?

Staff Response: The *Groundwater Monitoring Network Technical Report and Work Plan* is a new required study. The purpose is to evaluate the adequacy of the existing groundwater monitoring network and evaluate whether this network adequately monitors the effects of the discharge from the disposal ponds on groundwater. This new required study must also include an analysis of the groundwater data collected from the existing groundwater monitoring wells.

Changes: None.

HDWD-11

Subject(s): MRP, § A.2

Requested Revision(s): None.

Comment(s): What would we need to do to get approval by the EO to perform the daily coliform test using the IDEX method? We have two certified Grade 1 Lab technicians on staff, and this would help save on lab and currier costs.

Staff Response: A request for approval to the Executive Officer and DDW would have to be submitted to perform the daily coliform test using a method other than that described in the MRP. A description of the method requested would have to be included in the request. HDWD must also provide supporting documentation as to why the alternative method is as reliable as U.S. Environmental Protection Agency-approved procedures.

Changes: None.

HDWD-12

Subject(s): MRP, § A.5

Requested Revision(s): None

Comment(s): Do we need to get new approval on our time weighted method for composite sampling?

Staff Response: Time-weighted composite sampling is a type of sample that is presently performed by HDWD per Order R7-2015-0043. If the basis for sampling has not changed, there is no need for new approval.

Changes: None.

HDWD-13

Subject(s): MRP, § A.7.d

Requested Revision(s): None.

Comment(s): Do we include the field calibration reports in our monthly monitoring report or only upon request?

Staff Response: Field calibration reports should be submitted annually per MRP section H.3.f. The frequency at which the instruments are field calibrated should be at the frequency recommended by the manufacturer.

Changes: None

HDWD-14

Subject(s): MRP, § B (Influent Monitoring)

Requested Revision(s): None.

Comment(s): What was the reason for adding TDS as a new influent monitoring parameter?

Staff Response: Adding TDS as an influent monitoring parameter will determine the incremental addition of TDS in the wastewater when going through treatment.

Changes: None.

HDWD-15

Subject(s): MRP, § H.2.b (Reporting Requirements)

Requested Revision(s): None.

Comment(s): Sampling maps are new for reporting. Do we need to include each monthly report even if there are no changes from month to month?

Staff Response: Each Self-Monitoring Report (SMR) should have the ability to be reviewed as a stand-alone document. By including the sampling maps, any staff

reviewing the report would have all the necessary information available to them without having to search through additional documents.

Changes: None

HDWD-16

Subject(s): MRP, § H.4 (Reporting Requirements)

Requested Revision(s): None

Comment(s): Is the current signature line format that we use acceptable?

Staff Response: The current signature line format is acceptable.

Changes: None.